Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Gov Bill Daniel 161 Production Facility, located approximately one mile east of County Road 1170 and approximately two miles south-southeast of the intersection of County Road 117 and Farm-to-Market Road 770, Liberty County

Type of Operation:

Gas production well site

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: March 21, 2014

Comments Received: No

Penalty Information

Total Penalty Assessed: \$129,628

Amount Deferred for Expedited Settlement: \$25,925 Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$103,703

Total Due to General Revenue: \$0

Payment Plan: N/A **SEP Conditional Offset:** \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - High Site/RN - High

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: September 2002 and September 2011

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: July 11, 2013 Date(s) of NOE(s): August 28, 2013

Violation Information

- 1. Failed to meet the control requirements for flashed gases from the storage of volatile organic compounds ("VOC"). Specifically, four storage tanks at the Site were not routed to a vapor control system, resulting in the uncontrolled release of approximately 87.41 tons of VOC in calendar year 2009, 77.10 tons of VOC in calendar year 2010, 69.67 tons of VOC in calendar year 2011, and 96.38 tons of VOC in calendar year 2012 [30 Tex. ADMIN. CODE § 115.112(d)(4) and (d)(5) and Tex. Health & Safety Code § 382.085(b)].
- 2. Failed to obtain authorization to construct and operate a source of air emissions. Specifically, the Respondent failed to obtain an authorization prior to the operation of the Site [30 Tex. Admin. Code § 116.110(a) and Tex. Health & Safety Code §§ 382.0518(a) and 382.085(b)].
- 3. Failed to obtain a federal operating permit. Specifically, the Respondent did not obtain a federal operating permit after site-wide emissions exceeded the 25 tons per year major source threshold for VOC [30 Tex. Admin. Code §§ 122.121 and 122.130(b) and Tex. Health & Safety Code §§ 382.054 and 382.085(b)].
- 4. Failed to submit emissions inventories for calendar years 2009, 2010, 2011, and 2012. Specifically, in calendar years 2009, 2010, 2011, and 2012, the Site emitted more than 10 tons per year of VOC, but the Respondent failed to submit an emissions inventory for those years by March 31, 2010, March 31, 2011, March 31, 2012, and March 31, 2013, respectively [30 Tex. Admin. Code § 101.10(e) and Tex. Health & Safety Code § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days:
- i. Prepare and submit the emissions inventories for calendar years 2009, 2010, 2011, and 2012; and
- ii. Submit a federal operating permit application for the Site and a new source review permit application.
- b. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the permit applications within 30 days after the date of such requests, or by any other deadline specified in writing.
- c. Within 45 days, submit written certification to demonstrate compliance with Ordering Provision a.
- d. Within 60 days, route flashed gases from the Site to a vapor control system.
- e. Within 75 days, submit written certification demonstrate compliance with Ordering Provision d.
- f. Within 360 days, submit written certification that either authorization to operate the Site under the New Source Review Program has been obtained or that operation has ceased until such time that appropriate authorization is obtained.
- g. Within 720 days, submit written certification that either authorization to operate the Site under the Federal Operating Permits Program has been obtained or that operation has ceased until such time that appropriate authorization is obtained.

Litigation Information

Date Petition(s) Filed: N/A Date Answer(s) Filed: N/A SOAH Referral Date: N/A Hearing Date(s): N/A

Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Amancio R. Gutierrez, Enforcement Division, Enforcement Team 5, MC 149, (512) 239-3921; Candy Garrett, Enforcement Division,

MC 219, (512) 239-1456

TCEQ SEP Coordinator: N/A

Respondent: Belinda G. Salinas, Director - ESH&R, Camden Resources, LLC, 2626

Howell Street, Suite 800, Dallas, Texas 75204

Jon Glass, President, Camden Resources, LLC, 2626 Howell Street, Suite 800, Dallas,

Texas 75204

Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW) Policy Revision 2 (September 2002) PCW Revision October 30, 2008 Assigned 3-Sep-2013 Screening 26-Sep-2013 EPA Due 25-May-2014 PCW 13-Nov-2013 RESPONDENT/FACILITY INFORMATION Respondent Camden Resources, LLC Reg. Ent. Ref. No. RN106869704 Major/Minor Source Major Facility/Site Region 12-Houston CASE INFORMATION Enf./Case ID No. 47758 No. of Violations 4 Docket No. 2013-1938-AIR-E Order Type 1660 Media Program(s) Air Government/Non-Profit No Multi-Media Enf. Coordinator Amancio R. Gutierrez EC's Team Enforcement Team 5 Admin. Penalty \$ Limit Minimum \$0 Maximum \$10,000 Penalty Calculation Section TOTAL BASE PENALTY (Sum of violation base penalties) Subtotal 1 \$110,000 ADJUSTMENTS (+/-) TO SUBTOTAL 1 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. **Compliance History** -10.0% Enhancement Subtotals 2, 3, & 7 -\$11,000 Reduction for high performer classification. Notes 0.0% Enhancement Subtotal 4 \$0 **Culpability** No The Respondent does not meet the culpability criteria. Notes Good Faith Effort to Comply Total Adjustments Subtotal 5 \$0 50.0% Enhancement* Subtotal 6 \$23,878 **Economic Benefit** Total EB Amounts Capped at the Total EB \$ Amount \$23,878 Approx. Cost of Compliance SUM OF SUBTOTALS 1-7 \$122,878 Final Subtotal OTHER FACTORS AS JUSTICE MAY REQUIRE Adjustment \$0 0.0% Reduces or enhances the Final Subtotal by the indicated percentage.

Final Penalty Amount

Adiustment

Final Assessed Penalty

Reduction

20.0%

Deferral offered for expedited settlement.

\$122,878

\$122,878

-\$24,575

\$98,303

Notes

Notes

PAYABLE PENALTY

STATUTORY LIMIT ADJUSTMENT

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g.

Screening Date 26-Sep-2013

Docket No. 2013-1938-AIR-E

Respondent Camden Resources, LLC

Case ID No. 47758

Reg. Ent. Reference No. RN106869704

Media [Statute] Air

Enf. Coordinator Amancio R. Gutierrez

Policy Revision 2 (September 2002) PCW Revision October 30, 2008

Component	Number of		umbe	r Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)		0		0%
	Other written NOVs		0		0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)		0		0%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0		0%
Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)		0		0%
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		Ö,		0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)		0		0%
Emissions	Chronic excessive emissions events (number of events)		0		0%
Texas	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		0	;	0%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)		0		0%
	Ple	ase Ent	er Yes	or No	
	Environmental management systems in place for one year or more		No		0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program		No		0%
	Participation in a voluntary pollution reduction program		No		0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements		No		0%
neat Violator (
Moliance Histor	Adjustment Per ory Person Classification (Subtotal 7)	CEIILA	ye (, Sub	war 3)
High Per		centa	ıge	(Sub	total 7)
mpliance Histo	ry Summary				
Compliance History	Reduction for high performer classification.			:	,

Docket No. 2013-1938-AIR-E PCW	•	creening Date	ာမ
Policy Revision 2 (September 2002, PCW Revision October 30, 2008	Camden Resources, LLC	Respondent Case ID No.	
PCW Revision October 30, 2000		Reference No.	Reg. Ent. R
	Air	edia [Statute]	Med
	Amancio R. Gutierrez	if. Coordinator Violation Number	
(d)(4) and (d)(5) and Tex. Health & Safety Code §	**************************************	Rule Cite(s)	Vit
382.085(b)	30 rex. Admir. Code g 11		
quirements for flashed gases from the storage of	Failed to meet the cont		
VOC"). Specifically, four storage tanks at the Site	volatile organic compour		
rol system, resulting in the uncontrolled release of VOC in calendar year 2009, 77.10 tons of VOC in		ation Description	Violat
s of VOC in calendar year 2011, and 96.38 tons of			
in calendar year 2012.			
Base Penalty \$10,00			
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Minor	Major Moderate	Release	
Percent 50%	×	Actual Potential	OR
		i occircian	
Miss	Majaa Madaasta	matic Matrix	·Programm
Percent 0%	Major Moderate	Falsification	
		[
posed to significant amounts of pollutants which do			Matrix
n health or environmental receptors as a result of violation.	evels that are protective of	ii not exceed ie	Notes
iolocion:			33344443333
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Adjustment \$5,000		<u> </u>	
		<u> </u>	
		ents	olation Eve
	/iolation Events 19	2,54,44,644,644,640,000,000,000,000,000,000	blation Eve
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\$5,00		Number of V	blation Eve
\$5,00	daily	2,54,44,644,644,640,000,000,000,000,000,000	olation Eve
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\$5,00	daily weekly monthly quarterly x semiannual annual	Number of V mark only one	olation Eve
\$5,00	daily weekly monthly quarterly semiannual	Number of V mark only one	olation Eve
\$5,00	daily weekly monthly quarterly semiannual annual single event	Number of V mark only one with an x	blation Eve
\$5,00 1730 Number of violation days Violation Base Penalty \$95,00	daily weekly monthly quarterly semiannual annual single event urterly events are recommen	Number of V mark only one with an x	olation Eve
\$5,00 1730 Number of violation days Violation Base Penalty \$95,00 from the January 1, 2009 non-compliance date to 2013 screening date.	daily weekly monthly quarterly semiannual annual single event orterly events are recommenthe Septemb	Number of V mark only one with an x Nineteen qua	
\$5,00 1730 Number of violation days Violation Base Penalty \$95,00 from the January 1, 2009 non-compliance date to 2013 screening date.	daily weekly monthly quarterly semiannual annual single event arterly events are recommenthe septemb	Number of V mark only one with an x	
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\$5,00 1730 Number of violation days Violation Base Penalty \$95,00 from the January 1, 2009 non-compliance date to 2013 screening date.	daily weekly monthly quarterly semiannual annual single event arterly events are recommenthe Septemb	Number of V mark only one with an x Nineteen qua	
\$5,00 1730 Number of violation days Violation Base Penalty \$95,00 from the January 1, 2009 non-compliance date to 2013 screening date.	daily weekly monthly quarterly semiannual annual single event rterly events are recommenthe Septemb and the Septemb biy 0.09 Before NOV Extraordinary	Number of V mark only one with an x Nineteen qua	
Violation Base Penalty \$95,00 From the January 1, 2009 non-compliance date to 2013 screening date. Suction \$ To EDPRP/Settlement Offer	daily weekly monthly quarterly semiannual annual single event orterly events are recommenthe Septemb Extraordinary Ordinary N/A X The Response	Number of V mark only one with an x Nineteen qua	
\$5,00 1730 Number of violation days Violation Base Penalty \$95,00 from the January 1, 2009 non-compliance date to 2013 screening date. Suction \$7 to EDPRP/Settlement Offer Trk with x)	daily weekly monthly quarterly semiannual annual single event arterly events are recommenthe Septemb Diy Ordinary Ordinary N/A X	Number of V mark only one with an x Nineteen qua	
\$5,00 1730 Number of violation days Violation Base Penalty \$95,00	daily weekly monthly quarterly semiannual annual single event orterly events are recommenthe Septemb Extraordinary Ordinary N/A X The Response	Number of V mark only one with an x Nineteen qua	
\$5,00	daily weekly monthly quarterly semiannual annual single event orterly events are recommenthe Septemb Extraordinary Ordinary N/A X The Response	Number of V mark only one with an x Nineteen qua	
\$5,00 Violation Base Penalty \$95,00 from the January 1, 2009 non-compliance date to 2013 screening date. fuction \$100 EDPRP/Settlement Offer It is EDPRP/Settlement Offer this violation. Violation Subtotal \$95,000	daily weekly monthly quarterly semiannual annual single event. Interly events are recommenthe Septemb Diy Ordinary Ordinary N/A Notes The Respon	Mumber of V mark only one with an x Nineteen qua	od Faith Ef
\$5,000 Violation Base Penalty \$95,000 From the January 1, 2009 non-compliance date to 2013 screening date. Statutory Limit Test	daily weekly monthly quarterly semiannual annual single event. Interly events are recommenthe Septemb Diy Ordinary Ordinary N/A Notes The Respon	Mumber of V mark only one with an x Nineteen qua Efforts to Comp	od Faith Ef
\$5,000 Violation Base Penalty \$95,000 from the January 1, 2009 non-compliance date to 2013 screening date. fuction \$6 You EDPRP/Settlement Offer rk with x) does not meet the good faith criteria for this violation. Violation Subtotal \$95,000	daily weekly monthly quarterly semiannual annual single event. Interly events are recommenthe Septemb Diy Ordinary Ordinary N/A Notes The Respon	Mumber of V mark only one with an x Nineteen qua Efforts to Comp	od Faith Ef

	E	conomic I	Benefit	Wo	rksheet		
Respondent		urces, LLC					
Case ID No.							
eg. Ent. Reference No.		•					
Media						Percent Interest	Years of
Violation No.	1						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
	100 (11 11 11 11 11 11 11 11 11 11 11 11 11						
Delayed Costs							
Equipment	\$50,000	1-Jan-2009	1-Jun-2014	5.42	\$903	\$18,055	\$18,958
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	controls	were required to b	e installed by a	nd the	Final Date is the	The Date Required estimated date of co	mpliance.
Avoided Costs Disposal	ANNUAL	IZE [1] avoiueu	costs before	0.00	sg item (except \$0	so one-time avoid	so so
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
spection/Reporting/Sampling		 		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/equipment		 		0.00	\$0 \$0	<u>∌0</u> \$0	\$0 \$0
Financial Assurance [2]		 		0.00	\$0 \$0	\$0 \$0	
					PU	PU	
		 			¢Λ	¢Λ	\$0
ONE-TIME avoided costs [3]				0.00	\$0 \$0	\$0 \$0	\$0 \$0
					\$0 \$0	\$0 \$0	\$0

Screening Date	•	Docket No. 2013-1938-AIR-E	PCW
Respondent Case ID No.	Camden Resources, LLC	•	vision 2 (September 2002) Revision October 30, 2008
Reg. Ent. Reference No.		·	Nevision detaber 50, 2000
Media (Statute)		<i>\$</i>	
Enf. Coordinator Violation Number			
		6.110(a) and Tex. Health & Safety Code §§ 382.0518(a	$\overline{\mathbf{q}}$
Ruic Oice(3)		and 382.085(b)	
Violation Description		ation to construct and operate a source of air emissions. ent failed to obtain an authorization prior to the operation	
Aidiation pestription	specifically, the responde	of the Site.	
		Base Penalt	\$10,000
>> Environmental, Proper		E Madain	
	Harm		
Release OR Actual		Minor	
Potential		Percent 0%	111111111111111111111111111111111111111
S. Danamana sia Mahai		_	
>>Programmatic Matrix _Falsification	Major Moderate	Minor	
	X	Percent 25%	
			7
Matrix	100% of the r	rule requirement was not met.	
Notes			
		Adjustment \$7,50	001
		<u> </u>	
			\$2,500
Violation Events			
Number of '	Violation Events 3	78 Number of violation days	

	dally weekly		
	monthly x		
mark only one with an x	quarterly	Violation Base Penalt	ty \$7,500
	semiannual annual		
	single event		
			-1
Three mo		nded from the July 11, 2013 investigation date to the r 26, 2013 screening date.	
Lillian			
Good Faith Efforts to Com	ply 0.0°	% Reduction	\$0
	Before NOV Extraordinary	/ NOV to EDPRP/Settlement Offer	
	Ordinary		
	N/A x	(mark with x)	
, a	Notes The Respo	ndent does not meet the good faith criteria for	
	Notes	this violation.	
	B		1- 500
		Violation Subtot	al \$7,500
Economic Benefit (EB) for	this violation	Statutory Limit Test	
Estimat	ed EB Amount	\$1,313 Violation Final Penalty Total	al \$12,720
	This	riolation Final Assessed Penalty (adjusted for limits	\$12,720
	V 5111.5	(unjusted for limite	712,720

	See See	conomic	benerit	AAOI	rksneet		
Respondent	Europeanoranio en periodo de la composición del composición de la composición del composición de la co			\$ 75 S S S S S S S S S S S S S S S S S S			
Case ID No.	47758						
lea. Ent. Reference No.	RN106869704						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	. 2					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description			i mui Dutt		zanci con ouveu	Oncome costs	LD AMOUNT
item Description	i No commas or \$						
Delayed Costs		T			T	T	/ An
Equipment				0.00	\$0	\$0	\$0 #2
Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)		 		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/construction Land	-			0.00	\$0 \$0	}\u	<u> </u>
Record Keeping System	 			0.00	\$0 \$0	n/a	\$0 \$0
Training/Sampling		 	Maria di makarin dari	0.00	\$0 \$0	n/a	\$0 \$0
Remediation/Disposal		 		0.00	\$0 \$0	n/a	\$0
Permit Costs	\$5,000	31-Dec-2009	1-Apr-2015	5.25	\$1.313	n/a	\$1,313
Other (as needed)	33,000	1 21 000 2003	T 401 5013			<u> </u>	
	Ealling Lod Co.	/		0.00	l \$0	a Data Basilsad is I	L \$0
Notes for DELAYED costs	Estimated cos	The second secon	. *	on to op		e Date Required is I	
		non-complian	ce and the Fina	on to op I Date is	perate the Site. The sthe estimated da	e Date Required is I	the first date of
Notes for DELAYED costs Avoided Costs Disposal		non-complian	ce and the Fina	on to op I Date is	perate the Site. The sthe estimated da	e Date Required is t te of compliance.	the first date of
Avoided Costs		non-complian	ce and the Fina	on to op I Date is enterin	perate the Site. The the estimated dains	e Date Required is t te of compliance. or one-time avoid	the first date of
Avoided Costs Disposal Personnel		non-complian	ce and the Fina	on to op I Date is enterin 0.00	perate the Site. The the estimated daing item (except f	e Date Required is to the of compliance. or one-time avoid \$0	the first date of
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Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		non-complian	ce and the Fina	on to op I Date is enterin 0.00 0.00 0.00 0.00	perate the Site. The the estimated date of the estimated date of the state of the s	e Date Required is to the of compliance. or one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	the first date of sed costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment		non-complian	ce and the Fina	on to op I Date is enterin 0.00 0.00 0.00	perate the Site. The the estimated date of the stimated date of the stimated date of the stimate	e Date Required is to the of compliance. or one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the first date of sed costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		non-complian	ce and the Fina	on to op I Date is enterin 0.00 0.00 0.00 0.00	perate the Site. The the estimated date of the estimated date of the state of the s	e Date Required is to the of compliance. or one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	the first date of led costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		non-complian	ce and the Fina	on to or I Date is enterin 0.00 0.00 0.00 0.00 0.00 0.00 0.00	perate the Site. The sthe estimated date of the estimated date of the standard stand	e Date Required is to the of compliance. or one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the first date of
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		non-complian	ce and the Fina	on to or I Date is enterin 0.00 0.00 0.00 0.00 0.00 0.00 0.00	perate the Site. The sthe estimated date of the estimated date of the standard stand	e Date Required is to the of compliance. or one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the first date of seed costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
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Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		non-complian	ce and the Fina	on to or I Date is enterin 0.00 0.00 0.00 0.00 0.00 0.00 0.00	perate the Site. The sthe estimated date of the estimated date of the standard stand	e Date Required is to the of compliance. or one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the first date of seed costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		non-complian	ce and the Fina	on to or I Date is enterin 0.00 0.00 0.00 0.00 0.00 0.00 0.00	perate the Site. The sthe estimated date of the estimated date of the standard stand	e Date Required is to the of compliance. or one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the first date of seed costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date		Docket No. 2013-1938-AIR-E	PCW
Respondent Case ID No.	Camden Resources, LLC		Policy Revision 2 (September 2002) PCW Revision October 30, 2008
Reg. Ent. Reference No.			PCW Revision October 30, 2008
Media [Statute]	Air		
Enf. Coordinator			
Violation Number			
Rule Cite(s)	30 Tex. Admin. Code 95 12	22.121 and 122.130(b) and Tex. Health & Safe 382.054 and 382.085(b)	ty Code 33
Violation Description	obtain a federal operating ¡	ol operating permit. Specifically, the Responden permit after site-wide emissions exceeded the ar major source threshold for VOC.	
			se Penalty \$10,000
>> Environmental, Proper	ty and Human Healt! Harm	h Matrix	
Release	Major Moderate	Minor	
OR Actual		B	1
Potential		Percent 0%	
>>Prøgrammatic Matrix			***************************************
Falsification	Major Moderate	Minor Percent 25%	
Matrix			
Notes	100% of the r	ule requirement was not met.	
		Adjustment	\$7,500
The state of the s			\$2,500
Violation Events			
Number of V	/iolation Events 1	1096 Number of violation	days
ORDERANA A PA	daily		·
	weekly		,
mark only one	monthly	Violation Do	se Penalty \$2,500
with an x	quarterly semiannual	Violation Bas	\$2,500
100 or 200 de	annual		
An areason of	single event x		
	One singl	le event is recommended	
Good Faith Efforts to Comp			\$0
	Before NOV Extraordinary	NOV to EDPRP/Settlement Offer	. '
	Ordinary		
	N/A x	(mark with x)	1
	The Respoi	ndent does not meet the good faith criteria for	
	Notes	this violation.	
	<u>Canada da </u>	**	C. Landal D. Co.
		Violation	Subtotal \$2,500
Economic Benefit (EB) for	this violation	Statutory Limi	t Test
Estimate	ed EB Amount	\$1,564 Violation Final Pen	alty Total \$8,220
	E		-
	inis V	iolation Final Assessed Penalty (adjusted	101 mines j 30,420

Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) Notes for AVOIDED costs	ANNUAL	IZE [1] avoided	costs before	enterir 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANNUAL	IZE [1] avoided	costs before	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANNUAL	IZE [1] avoided	costs before	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANNUAL	IZE [1] avoided	costs before	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel spection/Reporting/Sampling	ANNUAL	IZE [1] avoided	costs before	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0
Disposal Personnel	ANNUAL	IZE [1] avoided	costs before	0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Disposal	ANNUAL	IZE [1] avoided	costs before	0.00	\$0	\$0	\$0 \$0
k i ne ine nen neliti par nelitze zitza nazitzi zitzanzezi zitzene zizene zizen eze eze ezen zitze 🗜	ANNUAL	IZE [1] avoided	costs before				
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enterir	ng item (except	for one-time avoid	ded costs)
		بالتناب أستناها المتابية	11.1.2.2.				
Notes for DELAYED costs						d is the date the fed the estimated date o	
Other (as needed)		н/		H 0.00	ı DU	11/6	Ψ
Other (as needed)	<u> </u>	1 21-060-5003	T-WDI-5010	0.00	\$1,364 \$0	n/a	\$1,504 \$0
Remediation/Disposal Permit Costs	\$5,000	31-Dec-2009	1-Apr-2016	6.25	\$0 \$1.564	n/a n/a	\$1,564
Training/Sampling		[0.00	\$0 \$0	<u>n/a</u>	\$0 \$0
Record Keeping System		 		0.00	\$0 #0	n/a	\$0 #0
Land		 		0.00	<u>\$0</u>	n/a	\$0 40
Engineering/construction		 		0.00	<u>\$0</u>	\$0	\$0 #8
Other (as needed)		 		0.00	\$0	\$0 #0	\$0
Buildings		 		0.00	<u>\$0</u>	\$0	\$0
Equipment		 		0.00	\$0	\$0	\$0
Delayed Costs		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		1	T	r	
Item Description	No commas or \$						
		Date Required	Final Date	TIS	Turelest Paved	Onetime Costs	EB Amount
			-:		*	5.0	1:
Violation No.	ა					F 6	; 1
Violation No.						Percent Interest	Depreciation
Media							Years of
	KIN HUNKNY / HA						
Put Defended No	041406060704						
Case ID No.							
ea. Ent. Reference No.							

Screening Date	Bi .	Docket No. 2013-1938-AIR-E	PCW
- BOOK - BOOK	Camden Resources, LLC		Policy Revision 2 (September 2002)
Case ID No. Reg. Ent. Reference No.			PCW Revision October 30, 2008
Media [Statute]		•	
Enf. Coordinator			
Violation Number Rule Cite(s)			
Rule Cite(3)	30 Tex. Admin. Code § 1	.01.10(e) and Tex. Health & Safety Code § 382	.085(b)
Violation Description	Specifically, in calendar ye per year of VOC, but the	sions inventories for calendar years 2009 and 2 ears 2009 and 2010, the Site emitted more tha Respondent failed to submit an emissions inve arch 31, 2010 and March 31, 2011, respectively	n 10 tons ntory for
		Bas	e Penalty \$10,000
>> Environmental, Proper	tv and Human Health	n Matrix	
	Harm		
Release OR Actual		Minor	
Potential		Percent 0%	-
>>Programmatic Matrix Falsification	Major Moderate	Minor	
	The X	Percent 25%	
Matrix	100% of the r	ule requirement was not met.	
Notes			
		Adjustment	\$7,500
THE PROPERTY OF THE PROPERTY O			\$2,500
Violation Events			
Number of '	Violation Events 2	518 Number of violation	days
	•		,
	daily weekly		
the state of the s	monthly		
mark only one with an x	quarterly	Violation Bas	e Penalty \$5,000
	semiannual annual		
	single event x		
Two single	events are recommended, t	pased on the two inventories that were not sub	mitted.
Good Faith Efforts to Com	ply 0.0%	6 Reduction	\$0
- control of the cont	Extraordinary Before NOV	NOV to EDPRP/Settlement Offer	
titum qu	Ordinary		
	N/A x	(mark with x)	
	The Respon	ndent does not meet the good faith criteria for	
	Notes	this violation.	
	£		
		Violation	Subtotal \$5,000
Economic Benefit (EB) for	this violation	Statutory Limit	Test
Estimate	ed EB Amount	\$2,044 Violation Final Pen	alty Total \$10,470
	B. C.	olation Final Assessed Penalty (adjusted f	
	IV Chia	Siddle Fellally (adjusted f	O

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.		urces, LLC					
leg. Ent. Reference No. Media						Percent Interest	Years of
Violation No.	4					Percent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
प्रशासकार प्रशासकार प्रशासकार । । । । । । । । । । । । । । । । । । ।					it i na entre e e claster e monero con una cada		
Delaved Costs							
Equipment		I I		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$10,000 Estimated co		1-May-2014	4.09	\$2,044	n/a	\$2.044
Other (as needed) Notes for DELAYED costs	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4.09 erdue e ventory compli	\$2,044 missions inventor was due and the ance.	n/a les (\$2,500 each, fo Final Date is the es	\$2.044 our total). The timated date of
Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4.09 erdue e ventory compli enterir	\$2.044 missions inventor was due and the ance. ng item (except	n/a les (\$2,500 each, fo Final Date is the es for one-time avoic	\$2.044 our total). The timated date of ded costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4.09 erdue e ventory compli enterir 0.00	\$2.044 :missions inventor / was due and the ance. 1g item (except \$0	ies (\$2,500 each, fo Final Date is the es for one-time avoid	\$2.044 bur total). The timated date of ded costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4.09 erdue e ventory compli enterir 0.00 0.00	\$2.044 :missions inventor y was due and the ance. 1g item (except \$0 \$0	ies (\$2,500 each, fo Final Date is the es for one-time avoid \$0 \$0	\$2.044 Fur total). The timated date of the costs to the
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Ispection/Reporting/Sampling	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4,09 erdue e ventory complienterir 0.00 0.00 0.00	\$2.044 missions inventor y was due and the ance. 1g item (except \$0 \$0 \$0	n/a les (\$2,500 each, fo Final Date is the es for one-time avoic \$0 \$0 \$0	\$2.044 our total). The timated date of ded costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4,09 erdue e ventory compli enterir 0.00 0.00 0.00 0.00	\$2.044 emissions inventor y was due and the ance. 19 item (except 1) \$0 \$0 \$0 \$0 \$0	n/a ies (\$2,500 each, fo Final Date is the es for one-time avoic \$0 \$0 \$0 \$0	\$2.044 our total). The timated date of \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4.09 erdue e ventory compli enterir 0.00 0.00 0.00 0.00	\$2.044 emissions inventor y was due and the ance. ng item (except \$0 \$0 \$0 \$0 \$0 \$0	n/a les (\$2,500 each, fo Final Date is the es for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$2.044 our total). The timated date of ded costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	erdue eventory complienterir 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0	\$2.044 emissions inventor y was due and the ance. 19 item (except) 50 50 50 50 50 50 50	fives (\$2,500 each, for Final Date is the estimate of the second of the	\$2.044 bur total). The timated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	4.09 erdue e ventory compli enterir 0.00 0.00 0.00 0.00	\$2.044 emissions inventor y was due and the ance. ng item (except \$0 \$0 \$0 \$0 \$0 \$0	n/a les (\$2,500 each, fo Final Date is the es for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$2,044 our total). The timated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated of Date Required	ost to prepare and I is the date the fir	l submit the overst emissions in	erdue eventory complienterir 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0	\$2.044 emissions inventor y was due and the ance. 19 item (except) 50 50 50 50 50 50 50	fives (\$2,500 each, for Final Date is the estimate of the second of the	\$2.044 bur total). The timated date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Penalty Calculation Worksheet (PCW) Policy Revision 3 (September 2011) PCW Revision August 3, 2011 Assigned 3-Sep-2013 PCW 13-Nov-2013 Screening 26-Sep-2013 **EPA Due** 25-May-2014 RESPONDENT/FACILITY INFORMATION Respondent Camden Resources, LLC Reg. Ent. Ref. No. RN106869704 Facility/Site Region 12-Houston Major/Minor Source Major CASE INFORMATION Enf./Case ID No. 47758 No. of Violations 1 Docket No. 2013-1938-AIR-E Order Type 1660 Media Program(s) Air Government/Non-Profit No Multi-Media Enf. Coordinator Amancio R. Gutierrez EC's Team Enforcement Team 5 \$0 Admin. Penalty \$ Limit Minimum Maximum \$25,000 Penalty Calculation Section TOTAL BASE PENALTY (Sum of violation base penalties) Subtotal 1 \$7,500 ADJUSTMENTS (+/-) TO SUBTOTAL 1 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. **Compliance History** Subtotals 2, 3, & 7 -10.0% Enhancement -\$750 Notes Reduction for high performer classification. Culpability No 0.0% Enhancement Subtotal 4 \$0 Notes The Respondent does not meet the culpability criteria. Good Faith Effort to Comply Total Adjustments Subtotal 5 \$0 **Economic Benefit** 0.0% Enhancement* Subtotal 6 \$0 Total EB Amounts Capped at the Total EB \$ Amount Approx. Cost of Compliance SUM OF SUBTOTALS 1-7 Final Subtotal \$6,750 OTHER FACTORS AS JUSTICE MAY REQUIRE 0.0% \$0 Reduces or enhances the Final Subtotal by the indicated percentage Notes Final Penalty Amount \$6,750

Final Assessed Penalty

Adjustment

Reduction

20.0%

Deferral offered for expedited settlement.

PAYABLE PENALTY

\$6,750

-\$1,350

\$5,400

STATUTORY LIMIT ADJUSTMENT

Notes

Reduces the Final Assessed Penalty by the indicated percentage.

DEFERRAL

PCW

Policy Revision 3 (September 2011) PCW Revision August 3, 2011

Respondent Camden Resources, LLC Case ID No. 47758

Reg. Ent. Reference No. RN106869704

Media [Statute] Air

Enf. Coordinator Amancio R. Gutierrez

Component	Number of Written notices of violation ("NOVs") with same or similar violations as those in	Enter Number Here	Aujust.
NOVs	the current enforcement action (number of NOVs meeting criteria)	0	0%
<u>:</u>	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ($number\ of\ counts$)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Addid:	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
		ease Enter Yes or No	
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
eat Violator (Adjustment Per Subtotal 3)	rcentage (Sub	total 2)
No	Adjustment Per	rcentage (Sub	total 3)
pliance Histo	ry Person Classification (Subtotal 7)		
High Perf	ormer Adjustment Per	centage (Sub	total 7)
pliance Histo	ry Summary		
Compliance History Notes	Reduction for high performer classification.		

Screening Date		Docket No. 2013-1938-AIR-E	PCW
Kespondent Case ID No.	Camden Resources, LLC 47758	Po	olicy Revision 3 (September 2011) PCW Revision August 3, 2011
Reg. Ent. Reference No.			
Media [Statute] Enf. Coordinator			
Violation Number			
Rule Cite(s)	30 Tex. Admin. Code §	101.10(e) and Tex. Health & Safety Code § 382.0	85(b)
Violation Description	Specifically, in calendar ye per year of volatile organ	sions inventories for calendar years 2011 and 201 ears 2011 and 2012, the Site emitted more than 1 nic compounds, but the Respondent failed to subn those years by March 31, 2012 and March 31, 20 respectively.	10 tons nit an
		Base F	Penalty \$25,000
>> Environmental, Proper	tv and Human Healt	b Matrix	
	Harm		
Release OR Actual		Minor	
Potential		Percent 0.0%	
>>Programmatic Matrix			
Falsification	Major Moderate	Percent 15.0%	
Matrix	100% of the r	ule requirement was not met.	
Notes			
		Adjustment	21,250
33843403331843534418451843888888888888888888888			\$3,750
			\$3,7301
Violation Events			
Number of \	Violation Events 2	543 Number of violation da	ys
	daily		
	weekly monthly		
mark only one with an x	quarterly	Violation Base F	Penalty \$7,500
	semiannual annual	_	
	single event x		
Two single	events are recommended, I	pased on the two inventories that were not submit	tted.

Good Faith Efforts to Com	ply 0.09 Before NOV		\$0
	Extraordinary		
	Ordinary N/A x	(mark with x)	
		ndent does not meet the good faith criteria for	
	Notes	this violation.	THE PARTY OF THE P
***************************************	· L		47.500
		Violation Su	
Economic Benefit (EB) for	this violation	Statutory Limit T	est
Estimate	ed EB Amount	\$0 Violation Final Penalt	y Total \$6,750
	This vi	olation Final Assessed Penalty (adjusted for	limits) \$6,750

Titem Cost Date Required Final Date Yrs Interest Saved Onetime Costs EB Amount		E	conomic	Benefit	Wo	rksheet		
Media Air Violation No. 1 Percent Interest Vears of perpeciation 5,0 1	Case ID No.	47758	·					
Tem Cost Date Required Final Date Yrs Interest Saved Onetime Costs EB Amount	Media	Air					Percent Interest	Years of Depreciation
Delayed Costs							5.0	15
Delayed Costs		Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment Buildings	Item Description	No commas or \$	Ť					
Buildings	Delayed Costs							
Other (as needed)	Equipment							
Company Construction Company	Buildings							
Land	Other (as needed)							
Record Keeping System	Engineering/construction		ll			and the second s	COCKER SANCE COCKER REPORT OF THE PARTY AND ADDRESS OF THE PARTY AND AD	
Training/Sampling	Land							
Notes for DELAYED costs	Record Keeping System							
Notes for DELAYED costs Disposal Personnel Disposal Personnel Disposal Supplies/equipment Disposal Disposal Personnel Disposal Disposal Personnel Disposal Dis	Training/Sampling							
Notes for DELAYED costs Company	· , ,		<u> </u>					
Notes for DELAYED costs Avoided Costs	Permit Costs							
Avoided Costs	Other (as needed)				n. 0.00			
Disposal Personnel Disposal	Notes for DELAYED costs		Economic benel	fit is included o	n V iolat	ion No. 4 of the a	companying PCW.	
D.00 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Avoided Costs	ANNUAL	IZE [1] avoided	costs before				*******
	''					A TOTAL PROPERTY OF THE PARTY O		
Supplies/equipment			<u> </u>					
Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) Notes for AVOIDED costs 0.00								
ONE-TIME avoided costs [3]			ļ					
Other (as needed) Notes for AVOIDED costs Other (as needed) Notes for AVOIDED costs								
Notes for AVOIDED costs	1		<u> </u>					
	Other (as needed)		ll		<u> L0.00</u>	l \$0	\$0	50
	Notes for AVOIDED costs							
Annroy Cost of Compliance	Approx. Cost of Compliance		\$0			TOTAL		\$0

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

PUBLISHED Compliance History Report for CN602891442, RN106869704, Rating Year 2013 which includes Compliance History (CH) components from September 1, 2008, through August 31, 2013.

Customer, Respondent, or CN602891442, Camden Resources, LLC Classification: HIGH Rating: 0.00 Owner/Operator: Regulated Entity: RN106869704, GOV BILL DANIEL 161 Classification: HIGH Rating: 0.00 PRODUCTION FACILITY 4 NO **Complexity Points:** Repeat Violator: 03 - Oil and Gas Extraction CH Group: APPROXIMATELY ONE MILE EAST OF COUNTY ROAD 1170 AND APPROXIMATELY TWO MILES SOUTH-SOUTHEAST Location: OF THE INTERSECTION OF COUNTY ROAD 117 AND FARM-TO-MARKET ROAD 770 IN LIBERTY COUNTY, TEXAS **REGION 12 - HOUSTON** TCEQ Region: ID Number(s): AIR QUALITY NON PERMITTED ID NUMBER R12106869704 09/01/2013 September 01, 2008 to August 31, 2013 **Compliance History Period:** Rating Year: 2013 Rating Date: **Date Compliance History Report Prepared:** November 18, 2013 **Agency Decision Requiring Compliance History:** Enforcement

Component Period Selected:

Name: Amancio R. Gutierrez Phone: (512) 239-3921

November 18, 2008 to November 18, 2013

Site and Owner/Operator History:

NO 1) Has the site been in existence and/or operation for the full five year compliance period?

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

3) If YES for #2, who is the current owner/operator? N/A

4) If YES for #2, who was/were the prior N/A

owner(s)/operator(s)?

5) If YES, when did the change(s) in owner or operator N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

	N/A
G.	Type of environmental management systems (EMSs): $\ensuremath{N/A}$
Н,	Voluntary on-site compliance assessment dates: $\ensuremath{N/A}$
I.	Participation in a voluntary pollution reduction program N/A
J.	Early compliance:
Sit	es Outside of Texas:

F. Environmental audits:

N/A

Texas Commission on Environmental Quality



IN THE MATTER OF AN	8	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
CAMDEN RESOURCES, LLC	§	
RN106869704	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2013-1938-AIR-E

I. JURISDICTION AND STIPULATIONS

- 1. The Respondent owns and operates a gas production well site located approximately one mile east of County Road 1170 and approximately two miles south-southeast of the intersection of County Road 117 and Farm-to-Market Road 770 in Liberty County, Texas (the "Site").
- 2. The Site consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
- 3. The Executive Director and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
- 4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about September 2, 2013.
- 5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 6. An administrative penalty in the amount of One Hundred Twenty-Nine Thousand Six Hundred Twenty-Eight Dollars (\$129,628) is assessed by the Commission in settlement

of the violations alleged in Section II ("Allegations"). The Respondent has paid One Hundred Three Thousand Seven Hundred Three Dollars (\$103,703) of the administrative penalty and Twenty-Five Thousand Nine Hundred Twenty-Five Dollars (\$25,925) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

- 7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 Tex. ADMIN. CODE § 70.10(a).
- 9. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 10. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 11. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Site, the Respondent is alleged to have:

- 1. Failed to meet the control requirements for flashed gases from the storage of volatile organic compounds ("VOC"), in violation of 30 Tex. Admin. Code § 115.112(d)(4) and (d)(5) and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on July 11, 2013. Specifically, four storage tanks at the Site were not routed to a vapor control system, resulting in the uncontrolled release of approximately 87.41 tons of VOC in calendar year 2009, 77.10 tons of VOC in calendar year 2010, 69.67 tons of VOC in calendar year 2011, and 96.38 tons of VOC in calendar year 2012.
- 2. Failed to obtain authorization to construct and operate a source of air emissions, in violation of 30 Tex. Admin. Code § 116.110(a) and Tex. Health & Safety Code §§ 382.0518(a) and 382.085(b), as documented during an investigation conducted on July 11, 2013. Specifically, the Respondent failed to obtain an authorization prior to the operation of the Site.
- 3. Failed to obtain a federal operating permit, in violation of 30 TEX. ADMIN. CODE §§ 122.121 and 122.130(b) and TEX. HEALTH & SAFETY CODE §§ 382.054 and 382.085(b), as

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documented during an investigation conducted on July 11, 2013. Specifically, the Respondent did not obtain a federal operating permit after site-wide emissions exceeded the 25 tons per year major source threshold for VOC.

4. Failed to submit emissions inventories for calendar years 2009, 2010, 2011, and 2012, in violation of 30 Tex. Admin. Code § 101.10(e) and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on July 11, 2013. Specifically, in calendar years 2009, 2010, 2011, and 2012, the Site emitted more than 10 tons per year of VOC, but the Respondent failed to submit an emissions inventory for those years by March 31, 2010, March 31, 2011, March 31, 2012, and March 31, 2013, respectively.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Camden Resources, LLC, Docket No. 2013-1938-AIR-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. It is further ordered that the Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order:
 - i. Prepare and submit the emissions inventories for calendar years 2009, 2010, 2011, and 2012 to:

Emissions Assessment Section Manager Air Quality Division, MC 164 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087 ii. Submit a federal operating permit application for the Site, in accordance with 30 Tex. ADMIN. CODE § 122.130, and a new source review permit application, in accordance with 30 Tex. ADMIN. CODE § 116.111, to:

Air Permits Division, MC 162 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

- b. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the permit applications within 30 days after the date of such requests, or by any other deadline specified in writing;
- c. Within 45 days after the effective date of this Agreed Order, submit written certification, as described in Ordering Provision No. 2.h., to demonstrate compliance with Ordering Provision No. 2.a.;
- d. Within 60 days after the effective date of this Agreed Order, route flashed gases from the Site to a vapor control system, in accordance with 30 Tex. ADMIN. CODE § 115.112;
- e. Within 75 days after the effective date of this Agreed Order, submit written certification, as described in Ordering Provision No. 2.h., and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.d.;
- f. Within 360 days after the effective date of this Agreed Order, submit written certification, as described in Ordering Provision No. 2.h., that either authorization to operate the Site under the NSR Program has been obtained or that operation has ceased until such time that appropriate authorization is obtained;
- g. Within 720 days after the effective date of this Agreed Order, submit written certification, as described in Ordering Provision No. 2.h., that either authorization to operate the Site under the Federal Operating Permits Program has been obtained or that operation has ceased until such time that appropriate authorization is obtained; and
- h. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

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The certification shall be submitted to:

Order Compliance Team Enforcement Division, MC 149A Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

with a copy to:

Air Section Manager Houston Regional Office Texas Commission on Environmental Quality 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

- 3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Site operations referenced in this Agreed Order.
- 4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 7. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature

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could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under Tex. Bus. Org. Code § 1.002.

8. Under 30 Tex. Admin. Code § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier.

For the Commission

SIGNATURE PAGE

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Pom Nove Tor the Executive Director	Date
Tot the shooting of the color	
I, the undersigned, have read and understand tagree to the attached Agreed Order on behalf of do agree to the terms and conditions specified thaccepting payment for the penalty amount, is many	f the entity indicated below my signature, and I herein. I further acknowledge that the TCEQ, in
additional penalties, and/or attorney feesIncreased penalties in any future enforces	may result in: ; ns submitted; General's Office for contempt, injunctive relief, s, or to a collection agency; ment actions; eral's Office of any future enforcement actions; by law.
Bec 6. Sue	2.18.2014 Date
Name (Printed or typed) Authorized Representative of Camden Resources, LLC	Dwestor, ESH&R Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section IV, Paragraph 1 of this Agreed Order.